

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

PANAGIOTA APOSTOLIDIS,	:	
Plaintiff,	:	Civil No.: 1:22-CV-02026
	:	
v.	:	
	:	
HERSHEY ENTERTAINMENT &	:	
RESORTS COMPANT, <i>et al.</i> ,	:	
Defendants.	:	Judge Jennifer P. Wilson
	:	

MOTION TO EXTEND DISCOVERY

Now comes, Plaintiff, Panagiota Apostolidis, by and through her counsel, Peggy M. Morcom, Esquire, and hereby moves this Honorable Court to extend the discovery deadline by ninety (90) days. In further support hereof, the parties state as follows:

1. Pursuant to this Court's Case Management Order of June 18, 2024, the fact discovery deadline is September 30, 2024 (Doc. 40).
2. The parties have exchanged their Voluntary Disclosures, have served written discovery, and Plaintiff's deposition was taken on September, 12, 2024.
3. The Parties are working cooperatively to schedule and complete additional depositions of fact witnesses. However, they are experiencing scheduling conflicts and limitations.

4. Accordingly, Plaintiff requests an additional ninety (90) days, up to and including December 30, 2024, in order for the parties to complete fact discovery.

5. Defendants concur in this Motion.

WHEREFORE, Plaintiff respectfully request that this Court grant her Motion and extend the fact discovery deadline ninety (90) days, up to and including December 30, 2024.

Respectfully submitted,

/s/ Peggy M. Morcom

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Attorney for Plaintiff

Dated: September 18, 2024

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2024, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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